

Lawrence M. Kaye Partner Phone 212 592 1410 Fax 212 545 3331 lkaye@herrick com

September 10, 2018

CIME FO RESPOND TO THE COMPLAINT EXTEROGO TO MOVEMBER 5, 2018. CONFERENCE ADJOURNED FO WEOMESDAY,

NOVEMBER 14, 2018, AT 4:30MM.

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Re Levin v. The Ministry of Culture and Tourism, Republic of Turkey, 18 Civ. 1586 (JGK

Dear Judge Koeltl:

Hon. John G. Koeltl

500 Pearl Street

United States District Judge Southern District of New York

New York, New York 10007-1312

BY ECF

The undersigned represent, respectively, Plaintiff, Eliezer Levin, and Defendant, The Ministry of Culture and Tourism, Republic of Turkey in the above-referenced matter. We jointly write to update the Court on the status of service of the Complaint on Defendant, set a deadline for the Defendant to answer or otherwise respond to the Complaint, and request an adjournment of the conference scheduled for October 3, 2018 at 4:30 pm.

As Plaintiff's counsel previously advised the Court, the relevant documents were translated and sent via international Federal Express to The Hague Central Authority for Turkey on May 14, 2018, and Plaintiff's counsel received confirmation that the documents were received by The Hague Central Authority on May 18, 2018. Plaintiff's counsel advises that it has not yet received confirmation from the Turkish authorities that they have effectuated service, pursuant to Turkish law, on the Ministry of Culture and Tourism.

Although Defendant's counsel is advised that the Complaint was received by the Ministry on or about July 16, 2018, since proof of service has not been received by Plaintiff's counsel, it is unclear when Defendant's time to respond starts to run. The parties would like to set a date certain for Defendant to respond to the Complaint and jointly request that the Defendant have until November 5, 2018 to answer or otherwise respond to the Complaint.

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Additionally, the parties request that the October 3, 2018 conference be adjourned to a date after November 5, 2018.

Respectfully submitted,

7 World Trade Center

HERRICK, FEINSTEIN LLP

WILMER CUTLER PICKERING HALE & DORR LLP

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cc: All Counsel of Record (via ECF)